

State of California

The Resources Agency of California

M e m o r a n d u m

To: Ms. Catherine Witherspoon, Executive Officer
California Air Resources Board
P.O. Box 2815
Sacramento, CA 95814

Date: November 10, 2004
Telephone: (916) 654-4064

From: **California Energy Commission** - Robert L. Therkelsen
1516 Ninth Street
Sacramento CA 95814-5512
Executive Director

Subject: COMMENTS ON AIR RESOURCES BOARD INDOOR AIR POLLUTION REPORT

The staff of the California Energy Commission wishes to thank you for the opportunity to comment on the Air Resources Board's report to the Legislature, "Indoor Air Pollution in California." Energy Commission staff have had very constructive discussions with ARB staff on some of the details of the report, and appreciate your staff's willingness to make clarifying revisions to the report to respond to comments.

We would like to congratulate you on the preparation of an excellent report. We appreciate your efforts to accurately report on the long-standing efforts of the Energy Commission to protect indoor air quality in the context of updating the Building Energy Efficiency Standards. Our regulations are designed to result in buildings that are both energy efficient and are provided with adequate ventilation for indoor air quality.

We agree with the conclusions that you state in Section 7, Options to Mitigate Indoor Air Pollution (p. 127):

This report has shown that there are many sources of indoor air pollution that produce substantial adverse health effects, result in lost productivity, and require considerable expenditures for health care. Despite these facts, there is no systematic program to improve indoor air quality, there are relatively few regulations or standards to address individual indoor air quality problems, and few resources focused on effectively addressing problems and promoting improvements. Current efforts to address indoor pollution are not commensurate with the scope of the risk to health it poses to Californians.

We would particularly like to express our support for the "General Mitigation Options" presented in Section 7.1 of the report. We agree that it is important for the Legislature to grant the authority to the appropriate state agencies to establish regulatory requirements for the sources of air pollution in our buildings. Controlling the emissions from sources of indoor air pollution is by far the highest priority means of protecting indoor air quality.

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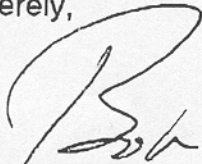
The maintenance of reasonable ventilation levels in buildings, as is done in the Building Standards, in comparison, is a secondary matter that is merely good design and construction practice. Excess emissions from uncontrolled sources can easily overpower reasonable ventilation levels potentially resulting in unhealthy situations regardless of the level of ventilation that is provided. It is critically important for the state to address the problem by establishing the authority to regulate pollutant sources.

In the absence of that authority, not only is there a risk of introducing pollutants in excess of what can be diluted through reasonable ventilation, but also there is the potential for wasting energy by having unnecessarily high ventilation in an attempt to dilute the avoidable emissions from sources that are commonly present in buildings. Both of these outcomes are counter to the interests of the citizens of California.

We agree with the elements of a properly established indoor air pollution program as they are listed in Section 7.1 of the report (pp. 127-128).

The Energy Commission staff believes that the report will be an important vehicle for informing the Legislature, state and local agencies, and the public on the subject of indoor air pollution. We hope our comments are useful to you, and thank you for the opportunity to provide them. If you have any comments or need any clarification, please contact Bill Pennington of the Energy Efficiency and Demand Analysis Division at (916) 654-4939.

Sincerely,



ROBERT L. THERKELSEN
Executive Director

cc: Peggy L. Jenkins
Manager, Indoor Exposure Assessment Section
Research Division
CA Air Resources Board